REMARKS

The present application was filed on May 10, 2001 with claims 1-24, of which claims 1, 16, and 22-24 are independent claims. With the present response, Applicants propose to amend claims 1, 5, 7-9, 12, 13, 15, and 16.

In the outstanding Office Action, the Examiner rejected claims 1-3, 14, 15, and 22-24 under 35 USC §102(e) as being unpatentable over Li et al. (U.S. Patent Publication No. 2002/0161746, hereinafter, "Li"), allowed claims 16-21, and objected to claims 4-13 as being dependent on a rejected base claim but allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Amendments to Claims

Applicants have made clarifying amendments to independent claims 1 and 16. These claim changes are supported, *inter alia*, by FIGS. 2, 3, 4, and 17A through 17C and associated text of Applicants' specification. Additionally, Applicants have made amendments of a grammatical nature to claims 5, 7-9, 12, 13, and 15.

Rejection to Independent Claims 1 and 22-24 Under 35 USC §102(e)

The Examiner rejected independent claims 1 and 22-24 under 35 USC §102(e) as being anticipated by Li. Applicants respectfully traverse this rejection. In particular, each of the independent claims 1 and 22-24 require creating visual feature vectors and textual feature vectors for a multimedia item or blocks thereof and require concatenating the visual and textual feature vectors into a unified feature vector.

The Examiner points to paragraph 19 of Li as disclosing these limitations. Paragraph 19 of Li is as follows (emphases added):

> In the illustrated example, a client 102 can search media content store 104 for pieces of media content 106 that match a set of search criteria. This search criteria includes both low-level features and high-level features. Low-level features are features that describe various low-level characteristics of the media content piece. For example, *low-level features for image content may include color, texture, and shape features. High-level features are text features* that are extracted from text associated with the media content piece, as discussed in more detail below. These low-level and high-level features corresponding to the

> media content piece 106 are compared to the set of search criteria to determine how closely the respective features match the set of search criteria. The results of these comparisons are then combined and the value resulting from the combination is used to determine how well the media content matches the set of search criteria.

The cited text of Li indicates that there are low- and high-level features in Li, that the low-level feature vectors are for image content while the high-level features are text features. Li consistently defines high-level features as text features. See, e.g., the cited text of Li above and paragraphs 28 and 30 of Li. However, nowhere in Li does Li disclose that visual feature vectors and textual feature vectors are concatenated into a unified feature vector. For instance, the cited text above indicates that search criteria including *both* low- and high-level features is searched and the *results* from performing searches using both low- and high-level features are combined. The cited text does not indicate that a unified feature vector is created from visual feature vectors and textual feature vectors, as claimed in independent claims 1 and 22-24 of Applicants' specification.

Moreover, Li continues to state in multiple locations that the low-level and high-level (text) features are operated on separately. See, for example, steps 204, 206 and 208 of FIG. 4. Additionally, paragraph 29 of Li describes low-level features, and the described features are not text features, while paragraphs 30-39 of Li describe high-level features, which are all text features. Li states that the low- and high-level features are stored, but indicates they both features are stored separately (see paragraph 40 of Li). Li does state that low-level feature vectors can be combined (see paragraph 41) into a single low-level feature vector, but Li never discloses that visual and textual feature vectors are concatenated into a unified feature vector, as required by independent claims 1 and 22-24.

As another example, paragraph 50 of Li describes how both low-level and high-level query vectors are generated for searching. As an additional example, paragraphs 52 to 56 of Li describe matching using separate low-level and high-level queries and provide equations for separate low-level and high-level queries.

Consequently, Applicants respectfully submit that Li never discloses at least the limitation in independent claims 1 and 22-24 of concatenating visual and textual

feature vectors into a unified feature vector. Applicants therefore respectfully request the §102(e) rejection to independent claims 1 and 22-24 be withdrawn.

Rejections to Dependent Claims 1-3, 14, and 15 Under 35 USC §102(e)

In the outstanding Office Action, the Examiner rejected dependent claims 2, 3, 14, and 15 under 35 USC §102(e) as being anticipated by Li. As argued above, Applicants respectfully submit that independent claim 1 is patentable over Li. Because independent claim 1 is patentable, dependent claims 2, 3, 14, and 15, which include all limitations of independent claim 1, are also patentable for at least the reasons given above along with other limitations the dependent claims add to independent claim 1. Furthermore, Applicants also assert that dependent claims 2, 3, 14, and 15 recite patentable subject matter in their own right.

Conclusion

All of the pending claims, i.e., claims 1-24, are in condition for allowance and such favorable action is earnestly solicited.

If any outstanding issues remain, or if the Examiner has any further suggestions for expediting allowance of this application, the Examiner is invited to contact the undersigned at the telephone number indicated below.

The Examiner's attention to this matter is appreciated.

Respectfully submitted,

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